

**ENTERED**

March 11, 2024

Nathan Ochsner, Clerk

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>In re:</b>  <b>Fieldwood Energy III LLC, et al.,</b>  <b>Post-Effective Date Debtors<sup>1</sup>.</b>	§ § § § § §	<b>Case No. 20-33948 (MI)</b>  <b>Chapter 11</b>  <b>Jointly Administered</b>
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**STIPULATION AND AGREED ORDER EXTENDING RESPONSE DATE AND  
RESETTING HEARING DATE ON PLAN ADMINISTRATOR’S OBJECTION TO  
ADMINISTRATIVE PROOFS OF CLAIM FILED BY  
CHEVRON U.S.A. INC.; NOBLE ENERGY, INC.; TEXACO, INC.; UNION OIL  
COMPANY OF CALIFORNIA; AND UNOCAL PIPELINE COMPANY**  
**[this relates to Dkt. No. 2827]**

This stipulation and agreement (the “**Stipulation**”) is entered into by and among (i) David Dunn, the plan administrator (the “**Plan Administrator**”) appointed pursuant to the Notice of (I) Entry of Order Confirming Joint Chapter 11 Plan of Fieldwood Energy LLC and its Affiliated Debtors [Dkt. No. 2016])<sup>2</sup>; and (ii) Chevron U.S.A. Inc. (“**CUSA**”); Noble Energy, Inc. (“**Noble**”); Texaco Inc. (“**Texaco**”); Union Oil Company of California (“**Union Oil**”); and Unocal Pipeline Company (“**UPC**”, collectively, “**Chevron**”) regarding the Plan Administrator’s Objection to Chevron U.S.A. Inc.; Noble Energy, Inc.; Texaco Inc.; Union Oil Company of California; and Unocal Pipeline Company’s Administrative Expenses Proofs of Claim [Dkt. No. 2827] (the “**Objection**”). The

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<sup>1</sup> The Post-Effective Date Debtors, along with the last four digits of each Post-Effective Date Debtor’s federal tax identification number, as applicable, are: Fieldwood Energy III LLC (6778); Fieldwood Energy Offshore LLC (4494), Fieldwood Energy Inc. (4991), GOM Shelf LLC (8107), and FW GOM Pipeline, Inc. (8440). Fieldwood Energy III, LLC, Fieldwood Energy Offshore LLC, and Fieldwood Energy Inc. are managed and operated by the Plan Administrator, whose primary mailing address is 16255 Ventura Blvd., Suite 440, Encino, CA, 91436, C/O of Province LLC. GOM Shelf LLC and FW GOM Pipeline, Inc. (collectively, the “Post-Effective Date Subsidiaries”) are managed and operated by Jon Graham, as sole manager of each Post-Effective Date FWE I Subsidiary. The Debtors in the other nine pending chapter 11 cases (which continue to be jointly administered with the cases of the Post-Effective Date Debtor), each of which have either been dissolved or merged into other entities as of the Effective Date, consist of the following: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422).

<sup>2</sup> Capitalized terms used but otherwise not defined herein shall have the meanings ascribed to such terms in the Plan.

Parties hereby stipulate and agree as follows:

**WHEREAS**, on or about March 22, 2022, each of the Chevron entities timely filed separate administrative expense proofs of claim identified as Administrative Expense Claim Numbers 1056, 1057, 1058, 1059, 1060, 1061, 1062, 1063, 1064, 1065, 1066, 1067, 1068, 1069, 1070, 1071, 1072, 1073, 1074, 1075, 1076, 1077, 1078, 1079, 1080, and 1081 (collectively, the “**Chevron Administrative Claims**”).

**WHEREAS**, the Plan Administrator filed his Objection on August 15, 2023, which included a response date of September 14, 2023, and an initial pre-trial hearing on October 2, 2023 at 10:30am CT.

**WHEREAS**, on October 16, 2023, the Court entered the *Stipulation and Agreed Order Extending Response Date and Resetting Hearing Date on Plan Administrator’s Claim Objections* [Dkt. No. 2948].

**WHEREAS**, on December 12, 2023, the Court entered the *Stipulation and Agreed Order Extending Response Date and Resetting Hearing Date on Plan Administrator’s Objection to Administrative Proofs of Claim filed by Chevron U.S.A. Inc.; Noble Energy, Inc.; Texaco, Inc.; Union Oil Company of California; and Unocal Pipeline Company* [Dkt. No. 2988]

**WHEREAS**, the initial pre-trial hearing on the Objection is currently set for April 3, 2024 at 9:00a.m. CT and Chevron’s response date is currently set for March 12, 2024.

**WHEREAS**, the Parties have agreed to extend the deadline for Chevron to respond to the Objection until Friday, May 24, 2024 (the “**Extended Response Deadline**”).

**WHEREAS**, for the foregoing reasons, the Plan Administrator and Chevron request a continuance of the April 3, 2024, hearing with respect to the Objection. The Plan Administrator and Chevron request the hearing be continued until after the Extended Response Deadline to a date that

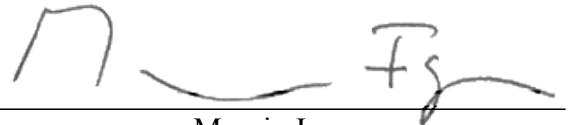
the Court is available.

**WHEREAS**, the Parties have agreed to enter into and jointly submit this Stipulation extending Chevron's response date and resetting the date of the initial pre-trial hearing in connection with the Objection.

**NOW, THEREFORE**, based upon the agreement of the Parties, and for good cause shown, it is hereby **ORDERED, ADJUDGED** and **DECREED** that:

1. The date for Chevron to respond to the Objection is continued until May 24, 2024.
2. The hearing on the Plan Administrator's Objection [Dkt. No. 2827] is set for June 10, 2024 at 10:00 a.m.

Signed: March 11, 2024

  
Marvin Isgur  
United States Bankruptcy Judge

**IN WITNESS WHEREOF**, this Stipulation has been executed and delivered as of the day and year first below written.

Dated: March 8, 2024

**BOND ELLIS EPPICH SCHAFFER JONES ANDREWS MYERS, P.C.  
LLP**

/s/ Aaron Guerrero

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**ATTORNEYS FOR DAVID DUNN, PLAN  
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**ATTORNEYS FOR CHEVRON U.S.A.;  
NOBLE ENERGY, INC.; TEXACO,  
INC.; UNION OIL COMPANY OF  
CALIFORNIA; AND UNOCAL  
PIPELINE COMPANY**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 8th day of March, 2024 a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Aaron Guerrero

Aaron Guerrero